



March 20, 2006

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at the Chief Information Officer (CIO) Executive Summit in Washington, DC

On March 22-24, 2006, Oracle will hold a CIO Executive Summit in Washington, DC, to bring together approximately 225 Chief Executive Officers from the government, industry, and academia. Portions of the summit on March 22 - 23 are particularly suited to government interests. On the evening of March 22, there will be a networking reception at the State Department, and on the morning of March 23 there will be a networking breakfast and presentations on globalisation and its affect on the United States from various perspectives. The keynote speaker will be General Colin Powell, the former Secretary of State, who will speak on "Inside Leadership -- a Global Perspective." The rest of the summit is devoted to topics more suited to private business interests.

Oracle has provided a breakdown of per person costs by activity. The networking reception is valued at \$135.00 and the networking breakfast is valued at \$50.00 per person. Attendees are reminded of the \$20 gift exception at 5 CFR § 2635.204(a) which provides that employees may accept gifts valued at no more than \$20 per occasion with a \$50 annual cap on gifts from one source in a calendar year.

I find that the networking reception at the State Department on the evening of March 22 and the networking breakfast and presentations on the morning of March 23, meet the requirements of a "widely-attended gathering" as defined in 5 CFR § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend these portions of the summit because they will have the opportunity to exchange information and ideas of mutual interest with their counterparts in government, industry, and academia. This will further Agency programs and operations. Accordingly, NASA employees whose duties do not substantially affect Oracle may accept an invitation for free attendance to the networking reception at the State Department on March 22, the networking breakfast on March 23, and the summit presentations on the morning of March 23.

NASA employees whose duties may substantially affect Oracle, such as by way of procurement duties, should seek an individual determination pursuant to 5 CFR § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

for A handwritten signature in cursive script, appearing to read "R. Andrew Falcon".

R. Andrew Falcon